

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

X CORP.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	No. 7:24-cv-00114-B
	§	
WORLD FEDERATION OF ADVERTISERS;	§	
MARS, INCORPORATED;	§	
CVS HEALTH CORPORATION;	§	
ØRSTED A/S;	§	
TWITCH INTERACTIVE, INC.	§	
NESTLÉ S.A.; NESTLE USA, INC.;	§	
ABBOTT LABORATORIES;	§	
COLGATE-PALMOLIVE COMPANY;	§	
LEGO A/S; LEGO BRAND RETAIL, INC.;	§	
PINTEREST, INC.;	§	
TYSON FOODS, INC.;	§	
SHELL PLC; SHELL USA, INC.; AND	§	
SHELL BRANDS INTERNATIONAL AG,	§	
	§	
<i>Defendants.</i>	§	

**APPENDIX IN SUPPORT OF DEFENDANT LEGO A/S’S MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

Defendant LEGO A/S (“Defendant”) hereby submits the following Appendix pursuant to Local Rule 7.1(i) for the United States District Court for the Northern District of Texas. The evidence attached hereto is submitted in support of Defendant LEGO A/S’s Motion to Dismiss for Lack of Personal Jurisdiction and Brief in Support, which is being filed simultaneously herewith.

The contents of this Appendix are:

PAGES	EXHIBIT	DESCRIPTION
App. 004-005	1	Declaration of Renee Oliver

App. 007-008	2	Declaration of Caroline Soriano
--------------	---	---------------------------------

Respectfully submitted,

By: /s/ Minoo Blaesche

Minoo Blaesche  
mblaesche@jw.com  
**JACKSON WALKER LLP**  
Texas Bar No. 24075102  
2323 Ross Avenue, Suite 600  
Dallas, TX 75201  
Phone: (214) 953-6051  
Fax: (214) 661-6800

Chahira Solh (*Admitted Pro Hac Vice*)  
csolh@crowell.com  
**CROWELL & MORING LLP**  
3 Park Plaza, 20th Floor  
Irvine, CA 92614  
Phone: (949) 798-1367

Sima Namiri-Kalantari (*Admitted Pro Hac Vice*)  
snamiri@crowell.com  
**CROWELL & MORING LLP**  
515 South Flower Street, 41st Floor  
Los Angeles, CA 90071  
Phone: (213) 443-5564

Kenneth Dintzer (*Admitted Pro Hac Vice*)  
kdintzer@crowell.com  
**CROWELL & MORING LLP**  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004  
Phone: (202) 624-2561

*Attorneys for LEGO A/S*

# EXHIBIT - 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

**X CORP.,**

Plaintiff,

v.

Case No. 7:24-cv-00114-B

**WORLD FEDERATION OF ADVERTISERS;  
MARS, INCORPORATED;  
CVS HEALTH CORPORATION; ØRSTED  
A/S; TWITCH INTERACTIVE, INC.;  
NESTLÉ S.A.; NESTLE USA, INC.;  
ABBOTT LABORATORIES;  
COLGATE-PALMOLIVE COMPANY;  
LEGO A/S; LEGO BRAND RETAIL, INC.;  
PINTEREST, INC.; TYSON FOODS, INC.;  
SHELL PLC; SHELL USA, INC.; and SHELL  
BRANDS INTERNATIONAL AG,**

Defendants.

**DECLARATION OF RENEE OLIVER**


1. My name is Renee Oliver. I am a resident of Connecticut, and I am over the age of eighteen. I am competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct to the best of my knowledge.
2. I am a Senior Director in the Global Strategic Tax & Customs team of LEGO Systems, Inc. and have served in that position since April 1, 2023. In this role, I have personal knowledge regarding the corporate structure and business dealings of the various entities that make up the LEGO Group.
3. LEGO A/S is a private company organized under the laws of Denmark. LEGO A/S is headquartered in Billund, Denmark with a principal place of business in Billund, Denmark. LEGO A/S is directly or indirectly owned by KIRKBI A/S, a private Danish Corporation, and the LEGO Foundation, a Danish entity. For the avoidance of doubt, LEGO A/S is not directly or indirectly owned by any entity incorporated in the United States.
4. Although LEGO A/S has wholly-owned direct and indirect subsidiaries that operate in the United States, those subsidiaries are separate legal entities with separate employees, finances, and operations. LEGO A/S does not control the daily business affairs of its

wholly-owned subsidiaries, nor does it control their contracting and negotiation activities. Each of these wholly-owned subsidiaries has its own leadership team as well as a proper board of directors and officers.

5. LEGO A/S does not transact business in the United States. Nor does LEGO A/S employ any individuals that are based in the United States. LEGO A/S does not directly engage in any marketing, manufacturing, or sales activities in the State of Texas or the United States.
6. None of LEGO A/S's executives are based in the United States. By extension, none of LEGO A/S's executives in advertising and media-related roles are based in the United States or the Northern District of Texas.
7. LEGO A/S does not have an office in the United States. LEGO A/S has never had an office in the State of Texas. LEGO A/S does not have headquarters in the State of Texas. LEGO A/S is not licensed to conduct business in the State of Texas. LEGO A/S has never maintained business operations in the State of Texas, let alone in the Northern District of Texas.
8. LEGO A/S has never employed any officers, directors, employees, or agents in the State of Texas. LEGO A/S has never held an event or conference in the State of Texas. LEGO A/S has never provided services in the State of Texas.
9. None of LEGO A/S's initiatives have been purposefully directed to any activity or market in the State of Texas.
10. LEGO A/S has never owned property in the State of Texas. LEGO A/S has never held any bank accounts in the State of Texas. LEGO A/S has never owned securities of any entity headquartered in the State of Texas. LEGO A/S has never held any investments in the State of Texas.
11. LEGO A/S has never purchased advertising in the State of Texas. Nor has it paid any advertising funds into the United States or into the State of Texas.
12. LEGO A/S and LEGO Brand Retail, Inc. are distinct entities. They keep separate financial records, file taxes independently, operate from different offices, and employ different staff, officers, and directors. LEGO A/S has no influence or control over the daily operations of LEGO Brand Retail, Inc.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

EXECUTED on May 8, 2025

  
Name Renee Oliver  
Title Sr. Tax Director

# EXHIBIT - 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

**X CORP.,**

Plaintiff,

v.

Case No. 7:24-cv-00114-B

**WORLD FEDERATION OF ADVERTISERS;  
MARS, INCORPORATED;  
CVS HEALTH CORPORATION; ØRSTED  
A/S; TWITCH INTERACTIVE, INC.;  
NESTLÉ S.A.; NESTLE USA, INC.;  
ABBOTT LABORATORIES;  
COLGATE-PALMOLIVE COMPANY;  
LEGO A/S; LEGO BRAND RETAIL, INC.;  
PINTEREST, INC.; TYSON FOODS, INC.;  
SHELL PLC; SHELL USA, INC.; and SHELL  
BRANDS INTERNATIONAL AG,**

Defendants.

**DECLARATION OF CAROLINE SORIANO**

1. My name is Caroline Soriano. I am a resident of Connecticut, and I am over the age of eighteen. I am competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct to the best of my knowledge.
2. I am the Vice President of Global Planning & Performance Brand, Marketing, Insights & Partnership at LEGO Systems, Inc. and have served in that position since January 1, 2022. In this role, I have personal knowledge regarding the LEGO Group's advertising and marketing decisions.
3. None of LEGO A/S's executives or employees were involved in any activities relating to WFA or GARM. LEGO A/S and LEGO Brand Retail, Inc. were not, and never have been, a member of GARM or WFA; nor have LEGO A/S or LEGO Brand Retail, Inc. ever paid membership dues to WFA or GARM.
4. LEGO A/S is not involved in day-to-day decision-making relating to LEGO Group advertising in Texas, the United States, or elsewhere.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

EXECUTED on May 9, 2025

A handwritten signature in black ink, appearing to read "Caroline Soriano", written in a cursive style.

---

Caroline Soriano

**CERTIFICATE OF SERVICE**

The undersigned Counsel hereby certifies that on this 14th day of May 2025, notice of the foregoing pleading was provided via the CM/ECF system to the counsel of record.

*/s/ Minoos Blaesche*

\_\_\_\_\_  
Minoos Blaesche

*Attorney for LEGO A/S*